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By ECF

March 21, 2022

Honorable Judge Naomi Reice Buchwald
United States District Judge United States Courthouse
500 Pearl St.
New York, NY 10007-1312

RE: Case No. 21 cv 8839 Rina Oh n/k/a Rina Oh Amen v. Virginia L. Giuffre

Dear Judge Buchwald:

This Office represents defendant VIRGINIA L. GIUFFRE in the above-referenced Action. In accordance with Your Honor's Individual Rules, I write to request an extension of time to May 7, 2022, for Defendant to answer, move or otherwise respond to the complaint in this action.

Defendant's current deadline to respond to the complaint is March 23, 2022. This is Defendant's first request for an extension and Plaintiff consents to this request.

This Office was just recently retained on this Action and Defendant currently lives abroad. The requested extension is necessary to allow this Office sufficient time to investigate Plaintiff's allegations, research the relevant law and draft an appropriate response to the complaint.

Accordingly, I respectfully request that Defendant's time to answer, move or otherwise respond to the complaint be extended to May 7, 2022.

I thank the Court for its attention to this matter.

Respectfully yours,

_____/s/_____
Kathleen R. Thomas, Esq.

cc:

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